REMARKS

I.   Introduction

Claims 1-17, 37-54, 56-59, 67, 69-70, and 74-80 are pending in the application and are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,324,541 to de l'Etraz (hereinafter "de l'Etraz") in view of U.S. Patent No. 7,003,546 to Cheah (hereinafter "Cheah"). Claims 1, 37, 54, and 67 are amended. Support for the claim amendments is found in the original specification generally at paragraph 25 and elsewhere throughout the specification, drawings, and original claims.

The amendments should be entered as they do not add any new matter or any new issues requiring further consideration and/or search and merely clarify the previous claims. In view of the foregoing amendments and the following remarks, the applicant respectfully traverses the rejections.

II.   Rejection of claims 1-17, 37-59, and 67-80 under 35 U.S.C. § 103(a)

To establish a *prima facie* case of obviousness, the Office action must show that the prior art references, when combined, teach or suggest all of the claim limitations. Because no combination of any cited reference teaches or suggests the subject matter of amended claims 1, 37, 54, and 67, the proposed combination of references do not make the requisite *prima facie* showing. Thus, the rejections under § 103(a) should be withdrawn.

A.   Cheah

Cheah generally discloses a system and method for controlled distribution of contact information over a network. The system includes a client-side or administrator application that controls, among other functions, the update and distribution of contact information. The client-side application interacts with a system server to control the exchange of contact information among users. A user requests an exchange of contact information with another user through the system server. Each registered user's local machine stores that particular user's collection of contacts while the system server centrally stores contact information for all registered users.

Further, Cheah discloses a user modifying their personal contact information and a system server distributing the modified data to all registered system users that previously requested the now-outdated information. The user modifies or updates their own personal contact information either locally or through a web server. Upon modification, the user saves the information to either or both of a local machine or the server system. If a user saves their modified information to a local machine, it is further saved to the server upon the user's subsequent connection to the server. Significantly, Cheah discloses distributing the modified contact information to other registered users upon determining that one or more contacts have been saved and updated <u>on the system server</u> (Col. 8, lines 42-44; col. 24, lines 16-19 and lines 55-67). In other words, Cheah discloses updating the exchanged contact information only upon detecting a user's personally-modified contact information within the centrally-stored contact information for all system users. It is the user's personal modification of this central repository that triggers update processing. The system then sets an update flag for each user that had previously included the now-outdated profile on their local machine. Later, as users connect their local machine to the system server, the system automatically sends the updated profiles to the connecting user or notifies the user of the updated profile.

B.   Claims 1, 37, 54, and 67

Some of the presently pending claims generally recite a relationship management system that initiates update processing upon detecting a modification of contact information. In particular, amended claim 67 recites:

> A relationship management system, comprising:
>
> a processor in communication with a memory and a server via an information network, the information network including a plurality of user interfaces and employing a communication protocol to facilitate communication between the processor, the memory, the server, and the plurality of user interfaces, wherein each of the plurality of user interfaces includes a display routine for creating a user interface screen for display on a user interface display screen and an access routine for communicating with the server via the information network, and wherein the display routine and the access routine facilitate at least one of accessing, storing, deleting, changing, and managing a first database and a second database;

the first database stored in the memory and including a first user collection owned by a first user of the system and second user collection owned by a second user of the system, each user collection including one or more contact files, with the different contact files within each user collection having data pertaining to different contacts; and

the second database stored in the server and including a firm collection, the firm collection including a duplicate contact file for each different contact file included in the first user collection and the second user collection, wherein each of the duplicate contact files within the firm collection includes data associated with one of the contacts for which a contact file exists within at least one of the first and second user collections;

wherein the first user collection stores at least one contact file associated with a particular contact, the second user collection stores at least one contact file associated with the particular contact, and the firm collection stores the duplicate contact file associated with the particular contact file stored within the first and second user collections;

an administration routine stored in the memory and executed by the processor, wherein the administration routine detects when the first user makes a change to the at least one contact file associated with the particular contact within the first user collection;

wherein the first database provides a message to the administration routine reflecting the nature of the change made to the at least one contact file associated with the particular contact within the first user collection;

wherein, in response to the message to the administration routine, the administration routine provides a message to a firm administrator reflecting the nature of the change made to the at least one contact file associated with the particular contact within the first user collection;

wherein the firm administrator accepts or rejects the change based on the nature of the change;

wherein, upon accepting the change based on the nature of the change, the administration routine makes a corresponding change to the duplicate contact file associated with the particular contact within the firm collection; and

wherein, upon accepting the change based on the nature of the change, the administration routine makes the corresponding change to the particular contact within the second user collection.

In contrast to the disclosure of Cheah, the amended claims generally recite that an administration routine detects the modification of a contact file that is owned by a user of the system and, upon approval, makes the change to a corresponding second contact file within a firm collection. As claimed, a firm collection includes a second contact file for each different first contact file included in the user collections. The firm collection recited in amended claims 1, 37, and 67 is generally analogous to the system server disclosed by Cheah that functions as a central repository for all system contact information. For example, amended claims 1, 37, and 67 generally recite detecting the change to a first contact file within a user collection owned by a user and, upon approval, making that change to a corresponding second contact file within the firm collection. Further, amended claim 54 generally recites detecting the change to a first contact file that is owned by a user and, upon approval, making that change to a second contact file that includes the data in common with the corresponding first contact file. In sum, amended claims 1, 37, and 67 recite detecting changed contact information within a user collection and amended claim 54 recites detecting a changed contact file owned by a user, while Cheah discloses detecting the change at the system server.

Comparing the disclosure of Cheah to the recitations of claims 1, 37, 54, and 67, Cheah discloses distributing changed contact information after it is saved to the system server and upon detecting that change to the duplicate contact file <u>within the system server</u>. Whereas, as generally recited in amended claims 1, 37, 54, and 67, the administration routine detects a change to a contact file <u>within a user collection</u> or contact file owned by the user. This difference is significant. Detecting the change to a user-owned contact file before it is saved to a firm collection, as generally recited in the amended claims, centrally controls the content and update of the second contact files. The disclosure of Cheah, however, does not permit the level of control recited in amended claims 1, 37, 54, and 67. Rather, because Cheah discloses detecting changes to contact information <u>after</u> the changes are saved to the system server, <u>any</u> user may modify the contact files of the system server. The level of control generally recited in the amended claims ensures the stability and reliability of the centrally stored contact files while the disclosure of Cheah, by permitting any user to alter the system server contact files before the changes are detected, does not.

At least for the reasons presented above regarding amended claims 1, 37, 54, and 67, the applicant submits that Cheah, either alone or in combination with any other cited reference, does not disclose the inventions recited in the amended claims. Therefore, all of the pending claims are allowable over de l'Etraz in view Cheah.

III.   Conclusion

In view of the above amendment and arguments, the applicant submits the pending application is in condition for allowance, and such action is requested at the examiner's earliest opportunity. The examiner is encouraged to contact the applicant's undersigned attorney with any questions regarding this response or the application as a whole at the telephone number indicated below. If there are any additional fees or refunds required, the Commissioner is directed to charge or debit Deposit Account No. 13-2855.

Dated: August 27, 2007

Respectfully submitted,
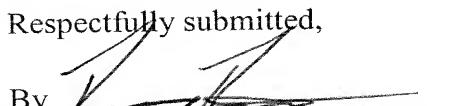
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